



US EPA RECORDS CENTER REGION 5



June 27, 2002

Mr. Ross Powers
On-Scene Coordinator
Emergency Response Branch – Region 5
United States Environmental Protection Agency (U.S. EPA)
9311 Groh Road
Grosse Ile, Michigan 48138

Subject: **Response to the June 13, 2002 Review of Removal Action Final Report**
MichCon Manufactured Gas Plant
South Green Avenue, Detroit, Michigan

Dear Mr. Powers:

Michigan Consolidated Gas Company (MichCon) respectfully responds to the United States Environmental Protection Agency (USEPA) issues regarding the Removal Action Final Report for the above referenced site. The comments and responses appear in the same sequence as the June 13, 2002 letter. The June 13, 2002 comments will be in italics and the responses will be in plain font.

1 Section 5.0 Removal Action Scope of Work

5.1 Permits

- 1. Page 11. The bulleted list of permits and permit modifications should include the permit number and the date of issuance for each item listed*

Page 11 has been revised to provide specific information on the permit number and the date of issuance.

5.7 Dust Control and Ambient Air Monitoring

- 1. Page 19, Paragraph 2. The description of the ambient air monitoring locations presented in bullet format should be consistent with the descriptions used in the analytical data. For example, the identifiers "Green/Tracks", "Post/Tracks", "Power Line East" and "Power Line West" are used in the analytical data but not in the text*

Page 19, paragraph 2 has been revised to provide consistent ambient air monitoring locations.

- ii *Page 19, Paragraph 2, Bullet 2. The location of monitoring well MW-3 is not shown in Figure 6 as indicated in the bullet. Figure 6 should be revised to show this well location.*

The location of monitoring well MW-3 has been added to the revised Figure 6.

- iii. *Page 21, Paragraph 9. The first bulleted item indicates that volatile organic compound (VOC) concentrations in ambient air ranged from 0.0 to 0.5 part per million (PPM). However, IT Corporation's on-site ambient air monitoring records show maximum VOC concentrations of 23.0 ppm on 07 Sep 2001. The text should be revised for accuracy. Also, the text should discuss the VOC concentration peaks indicated in IT's on-site ambient air monitoring records that exceeded the action level of 10.0 ppm.*

The VOC concentration indicated in the first bullet was for ambient monitoring at the Site perimeter. The VOC concentration indicated on 07 Sept 2001 was at a location within the Site interior and was not sustained. Additional text has been added to clarify the data and discuss those values detected above the action level.

5.8 *Transportation/Disposal of Excavated Materials*

- i. *Page 23, Paragraph 4. The transportation and disposal of the three 5-gallon pails containing tar-like material that are mentioned in Section 5.6.2, Paragraph 1, should be discussed in addition to the 25 drum remnants containing a tar-like substance.*

The text has been revised to include a discussion of the transportation and disposal of the three 5-gallon pails containing tar-like material.

5.13 *Backfilling and Site Restoration*

- i. *The unapproved backfill material from London Aggregate that was stockpiled on the north side of the site during the earlier part of the excavation activities should be discussed in Section 5.13. The backfill material was not approved by U.S.EPA and the City of Detroit after they reviewed the material sample analytical data.*

The text has been revised to address the above comment.

5.14 *Removal of Monitoring Wells*

- i. *The present condition of the monitoring wells remaining on site should be discussed in Section 5.14. For example, monitoring well MW-9 was damaged during excavation and removal of the unapproved backfill material stockpiled, and the present condition of this well should be described.*

The text has been revised to address the above comment.

2. *Section 6.0 Post Removal Site Control*

- i. *Page 30, Paragraph 1, Bullet 2. The designated "W-3" for monitoring well three should be "MW-3".*

Monitoring well MW-3 was removed during the excavation (i.e., MW-3 is located on the south side of the excavation). However, W-3 still exists and will be removed during Post Removal Site Control activities (i.e., W-3 is located on the northeast corner of the Site along S. Post Ave).

3. *Figures*

- i. *Figure 6. The legend of this figure should define each acronym used in the figure.*

Each acronym in Figure 6 has been identified in the legend. A revised copy of Figure 6 is enclosed.

4. *All relevant documents generated during the removal action, including manifests, invoices, contracts and permits mentioned in the consent order dated 20 November 1997, real time air monitoring records, instrument calibration logs, compaction test results, tailgate safety meetings records, weekly project meeting records, and monthly progress reports should be included in the appendixes*

All relevant documents generated during the removal action that are not included in the report will be on file at the DTE Energy office in Detroit, Michigan.

The revised text (pages 11 through 32 and table of contents) along with Figure 6 is enclosed (i.e., no changes to text pages 1 through 10, tables, other figures, or appendixes).

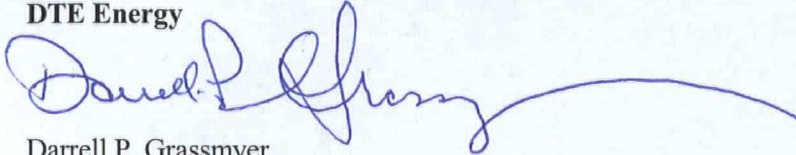
Mr. Darrell Grassmyer
June 21, 2002
Page 4

Shaw Environmental, Inc.

Upon your approval of the revised Removal Action Final Report, MichCon will finalize and resubmit the text portion of the report to the U.S. EPA for final approval. If you have any questions regarding the responses to the comments, please contact me at (313) 235-6396.

Sincerely,

DTE Energy



Darrell P. Grassmyer
Senior Environmental Engineer

Enclosure - Revised Removal Action Report

Cc: Arinze Nwamba – Altech Environmental Services, Inc.
Dan Estes – DTE Environmental Manager (letter only)
Project File
Agency File (letter only)